

KNEUPPER & COVEY, PC
KEVIN KNEUPPER (SBN 325413)
kevin@kneuppercovey.com
A. CYCLONE COVEY (SBN 335957)
cyclone@kneuppercovey.com
17011 Beach Boulevard, Suite 900
Huntington Beach, CA 92647
Telephone: (512) 420-8407

Attorneys for Plaintiff BiT Global Digital Ltd.

WILMER CUTLER PICKERING
HALE AND DORR LLP
SONAL N. MEHTA (SBN 222086)
Sonal.Mehta@wilmerhale.com
2600 El Camino Real, Suite 400
Palo Alto, CA 94306
Telephone: (650) 858-6000

DAVID Z. GRINGER (*pro hac vice*)
David.Gringer@wilmerhale.com
PAUL VANDERSLICE (*pro hac vice*)
Paul.Vanderslice@wilmerhale.com
7 World Trade Center
250 Greenwich Street
Telephone: (212) 230-8800

Attorneys for Defendant Coinbase Global, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

BIT GLOBAL DIGITAL LIMITED,

Plaintiff,

v.

COINBASE GLOBAL, INC.,

Defendant.

Case No. 3:24-CV-09019-AMO

**CIVIL LOCAL RULE 7-12
STIPULATION AND ~~PROPOSED~~
ORDER REGARDING
STAY OF DISCOVERY AND
CONTINUATION OF INITIAL CASE
MANAGEMENT CONFERENCE**

Hon. Araceli Martínez-Olguín

Pursuant to Civil Local Rule 7-12, Defendant Coinbase Global, Inc. (“Coinbase”) and Plaintiff BiT Global Digital, Ltd (“BiT Global”) hereby stipulate and agree as follows:

WHEREAS, Plaintiff BiT Global filed the Complaint (Dkt. 1) on December 13, 2024;

WHEREAS, on December 13, 2024, the Court set the Initial Case Management Conference for March 13, 2025 (Dkt. 11);

WHEREAS, the Complaint was served on Defendant Coinbase on December 16, 2024 (Dkt. 26);

WHEREAS, Coinbase has filed a motion to dismiss the complaint on January 21, 2025, BiT Global’s opposition to the motion to dismiss is due February 18, 2025, and Coinbase’s reply in support of its motion to dismiss is due March 4, 2025 (Dkt. 31);

WHEREAS, a hearing on the motion to dismiss has been noticed for April 3, 2025 (Dkt. 33), subject to the availability of the Court;

WHEREAS, the parties agree that good cause exists to stay discovery, including the conference required by Federal Rule of Civil Procedure 26, and agree not to engage in any discovery unless and until the Court rules that BiT Global has stated a claim upon which relief can be granted;

WHEREAS, because the parties’ agreement regarding the stay of discovery implicates the extent to which case management is needed, the parties respectfully submit that the Case Management Conference should be postponed until a date closer in time to when discovery will open, if at all, pursuant to the parties’ agreement.

NOW, THEREFORE, IT IS STIPULATED AND AGREED SUBJECT TO THE COURT’S APPROVAL:

- All discovery in this case is STAYED, including the conference required by Federal Rule of Civil Procedure 26, unless and until the Court denies Defendant Coinbase Global, Inc.’s motion to dismiss in whole or in part. In the event the Court grants the motion to dismiss in its entirety, with leave to amend, discovery shall remain stayed unless and until any subsequent motions to dismiss are resolved.
- The Case Management Conference shall be postponed until a date to be set by the Court after Coinbase files its Answer.

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2 Dated: January 29, 2025

KNEUPPER & COVEY, PC

3 By: /s/ A. Cyclone Covey
A. CYCLONE COVEY

4 *Attorney for Plaintiff*
5 BiT Global Digital, Ltd.

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7 WILMER CUTLER PICKERING HALE AND
8 DORR LLP

9 By: /s/ Sonal N. Mehta
SONAL N. MEHTA

10 *Attorney for Defendant*
11 Coinbase Global, Inc.

ATTORNEY ATTESTATION

I, Sonal N. Mehta, am the ECF User whose ID and password are being used to file this stipulation. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this document and all attachments has been obtained from each signatory.

Dated: January 29, 2025

By: /s/ Sonal N. Mehta
Sonal N. Mehta

PURSUANT TO STIPULATION, IT IS SO ORDERED.

